

Mark L. Smith (NV Bar #14762)
 msmith@sffirm.com
 Jacob L. Fannesbeck (NV Bar #11961)
 jfannesbeck@sffirm.com
SF FIRM, LLP
 6345 South Pecos Road, Suite 202
 Las Vegas, NV 89120
 Telephone: (725) 666-8701
 Facsimile: (725) 666-8710

Attorneys for Defendants

Timothy R. Pack (UT Bar # 12193)
 trp@clydesnow.com
 Aaron D. Lebenta (UT Bar # 10180)
 kmw@clydesnow.com
 Thomas A. Brady (UT Bar # 12454)
 tab@clydesnow.com
CLYDE SNOW & SESSIONS, P.C.
 201 South Main Street, Suite 2200
 Salt Lake City, UT 84111
 Telephone: (801) 322-2516

UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA

TETSUYA NAKAMURA, an individual,

 Plaintiff,

 v.

 SUNDAY GROUP INCORPORATED, a
 Delaware corporation, *et al.*,

 Defendants.

Case No.: 2:22-cv-01324-MMD-EJY

**STIPULATION AND [PROPOSED]
 SCHEDULING ORDER**

Plaintiff Tetsuya Nakamura and Defendants Sunday Group Incorporated, SGI Trust, Toshiki (Todd) Mitsuishi and James Pack (collectively, “Defendants”), hereby stipulate as follows:

WHEREAS, Plaintiff’s response to Defendants’ amended counterclaims is due on or before October 5, 2023, with Defendants’ opposition due on or before November 2, 2023, and Plaintiff’s reply due on or before November 30, 2023 (Dkt. 60);

WHEREAS, in parallel, discovery is ongoing;

WHEREAS, as it stands, initial expert disclosures are due on October 27, 2023, rebuttal expert disclosures are due on November 27, 2023, and fact discovery shall be completed by December 27, 2023 (Dkt. 50);

WHEREAS, the parties have begun serving and responding to written discovery requests but anticipate the need for additional time to complete discovery, including to schedule and take depositions;

WHEREAS, certain persons the parties intend to depose reside in Japan, thus presenting logistical obstacles to scheduling and completing the depositions; and

WHEREAS, the parties stipulate to extend certain discovery deadlines as follows;

IT IS ACCORDINGLY STIPULATED, pursuant to Civil L.R. 6-1 and 6-2, that, subject to any further request for an extension of time:

1. Fact discovery shall be completed by March 29, 2024.
2. Initial expert disclosures shall be made no later than February 1, 2024. Rebuttal expert disclosures shall be made no later than March 1, 2024.
3. The last day for filing dispositive motions shall be April 30, 2024.
4. The joint pretrial order shall be due no later than May 31, 2024, unless dispositive motions are pending on that date in which case the due date for the joint pretrial order is automatically extended to 30 days after a decision is issued on such motions.

DATED: September 14, 2023

CLYDE SNOW & SESSIONS, P.C.

By: /s/Timothy R. Pack
Timothy R. Pack (UT Bar # 12193)

Attorneys for Defendants
SUNDAY GROUP INCORPORATED,
SGI TRUST, TOSHIKI (TODD) MITSUISHI
AND JAMES PACK

DATED: September 14, 2023

FENWICK & WEST LLP

By: /s/Casey O'Neill
Casey O'Neill

Attorneys for Plaintiff
TETSUYA NAKAMURA

ORDER

IT IS SO ORDERED:

THE HONORABLE ELAYNA J. YOUCHAH
UNITED STATES MAGISTRATE JUDGE

DATED: _____